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10 Attorneys for Defendant

11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 JOEN MELENDEZ, an Individual

14 Plaintiff,

15 vs.

16 MASTERCORP COMMERCIAL  
17 SERVICES, LLC, a foreign company; DOES  
18 I-X; ROE CORPORATIONS I-X,

19 Defendants.

CASE NO. 2:21-cv-00967-JCM-VCF

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME FOR  
DEFENDANT TO ANSWER OR  
OTHERWISE RESPOND TO  
PLAINTIFF'S COMPLAINT**

**[FIRST REQUEST]**

20 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff JOEN  
21 MELENDEZ ("Plaintiff") and Defendant MASTERCORP COMMERCIAL SERVICES, LLC,  
22 ("Defendant"), by and through their respective counsel of record Jenny Foley of HKM  
23 EMPLOYMENT ATTORNEYS LLP, and Bruce C. Young, Esq. of the law firm LEWIS  
24 BRISBOIS BISGAARD & SMITH LLP, as follows:

25 The parties agree that an extension of time for Defendant to answer or otherwise respond  
26 to the Complaint is necessary and appropriate while Plaintiff examines information from  
27 Defendant regarding the proper employer entity to be named in this action. Based on the date of  
28 service, Defendant's response to Plaintiff's Complaint is currently due on June 14, 2021. In order  
to allow counsel for Plaintiff to re-examine and investigate the facts and assess the identity of the  
proper employer entity to be named as the defendant in this action, the Parties have agreed to

1 stipulate to extend the time for Defendant to respond to Plaintiff's Complaint up to and including  
2 June 28, 2021, or as otherwise ordered by this Court should Plaintiff choose to amend her  
3 Complaint prior to that date. This extension is not sought for any improper reason or for the  
4 purpose of delay.

5  
6 DATED this 14th day of June, 2021.

DATED this 14th day of June, 2021.

7 LEWIS BRISBOIS BISGAARD & SMITH LLP

HKM EMPLOYMENT ATTORNEYS

8 By /s/ Bruce C. Young, Esq.

By /s/ Jenny Foley, Esq.

9 Bruce C. Young, Esq.

Jenny Foley, Ph.D., Esq.

10 Paige S. Shreve, Esq.

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Attorneys for Plaintiff

Attorneys for Defendant

12  
13  
14 **ORDER**

15 Pursuant to the Stipulation of the Parties, and good cause appearing therefore:

16 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Defendant's response to  
17 Plaintiff's Complaint shall be filed on or before June 28, 2021, or as otherwise ordered by this  
18 Court should Plaintiff choose to amend her Complaint prior to that date..

19 DATED this 14th day of June, 2021.

20  
21   
22 UNITED STATES MAGISTRATE JUDGE